

May 1, 2019

CERTIFIED MAIL NO. 9171 9690 0935 0197 7772 94

David Still
Hanover Foods Corporation
1486 York Street
P.O. Box 334
Hanover, PA 17331

Re: Industrial Waste 3-A
Hanover Foods Industrial Wastewater Treatment Plant
NPDES Permit No. PA0044741
WQM Permit No. 6715201
Penn Township, York County

Dear Mr. Still:

On March 10, 2019, the Department of Environmental Protection (Department) received the 2018 Annual Report from Hanover Foods Corporation ("HFC") summarizing hydraulic loadings at the HFC Industrial Wastewater Treatment Plant (IWTP), as required by WQM Part II Permit No. 6715201.

A review of HFC's 2018 Annual Report indicates that Hanover Foods exceeded the IWTP hydraulic capacities approved in WQM Part II Permit No. 671520 (WQM Part II Permit) for the following:

WQM Part II Permit Hydraulic Capacities	Permit Rating	Reported Value
Average Annual Flow (AAF)	0.460 MGD	0.461 MGD
Monthly Maximum Average Flow (MMAF)	0.620 MGD	0.639 MGD
Maximum Daily Flow (MD)	1.280 MGD	1.355 MGD

Additionally, a review of HFC's 2018 Annual Report revealed the following deficiencies:

1. Average Annual Flows should be calculated using the sum of all daily flows received at Plant during a calendar year divided by the number of days flow was received at the Plant during the calendar year. (i.e. if the Plant only receives flow on 250 days of a given year the Average Annual flow is total flow / 250 days.)

2. HFC provided raw flow data without the analysis required to determine compliance with the WQM Part II Permit.
3. Insufficient data/analysis was submitted to determine if the IWTP operated within approved WQM Part II Permit ratings for Peak Hourly Flow (PH), Peak Instantaneous Flow (PI), and Maximum Daily (MD) Organic Loading.
4. HFC failed to provide a summary of BOD5, Total Nitrogen (TN) and Total Phosphorus (TP) loadings of the **process wastewater** received at the IWTP.
5. HFC failed to provide a summary of BOD5, TN and TP loadings of the **cooling water** received at the IWTP.
6. HFC reported CBOD5 for influent wastewater, not BOD5, as required by the WQM Part II Permit.
7. There is no discussion about hauled in waste from other facilities.
8. HFC failed to provide analysis that demonstrates that the loading to the IWTP is being managed such that the IWTP hydraulic and organic design capacities are not being exceeded.

The Department requests that HFC submit the analysis and information needed to address the deficiencies noted above within twenty-eight (28) calendar days of the date of this letter.

If you have any questions, please contact me at 717.705.4775 or eammon@pa.gov.

Sincerely,



Erick M. Ammon
Environmental Protection Compliance Specialist
Clean Water Program

Cc: Mr. Kumar Navile, Hanover Foods (electronic cc, knavile@hanoverfoods.com)

bcc: Janna Williams, Assistant Counsel (electronic bcc)
Maria Bebenek, Program Manager (electronic bcc)
Dan Martin, Environmental Engineering Manager (electronic bcc)
Victor Landis, Environmental Group Manager (electronic bcc)
Aaron Baar, Environmental Engineer (electronic bcc)
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T (via hard copy & electronic bcc)

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